

UNITED STATES BANKRUPTCY COURT  
FOR THE  
DISTRICT OF MASSACHUSETTS  
CENTRAL DIVISION

In Re:

ANTHONY J. RODRIQUENZ  
BRENDA M. CIRILLO

Debtors

Case No. 13-41492-MSH  
Chapter 13

**DEBTORS' MOTION TO CONVERT FROM CHAPTER 13 TO CHAPTER 7**

Now come the Debtors, Anthony J. Rodriquenz and Brenda M. Cirillo, and state the following:

1. The Debtors have been hard pressed to meet all their obligations under the Chapter 13 Plan due to a decrease in income.
2. The Debtors reluctantly need to convert to a Chapter 7.

WHEREFORE, the Debtors, Anthony J. Rodriquenz and Brenda M. Cirillo, move this Honorable Court to enter an order converting the case from Chapter 13 to Chapter 7.

Respectfully submitted,  
ANTHONY J. RODRIQUENZ,  
BRENDA M. CIRILLO,  
By their Attorney,

/s/Robert F. Casey, Jr.,  
Robert F. Casey, Jr.  
BBO# 077700  
Robert F. Casey, Jr., P.C.  
249 Ayer Road, Suite 102  
Harvard, MA 01451  
Telephone: (978) 772-2223  
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Dated: April 4, 2014

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**CERTIFICATE OF SERVICE**

I, Robert F. Casey, Jr., hereby certify that I caused to be served on this 4th day of April, 2014, by U.S. Postal First Class Mail and/or ECF, a true and correct copy of the Debtors'

**DEBTORS' MOTION TO CONVERT FROM CHAPTER 13 TO CHAPTER 7**

to the following:

VIA ECF:

Attorney Richard King – Assistant U.S. Trustee  
Attorney Denise M. Pappalardo – Chapter 13 Trustee  
Workers' Credit Union – Creditor  
Recovery Management System Corporation – Creditor

VIA FIRST CLASS MAIL

Asset Acceptance, LLC  
P.O. Box 2036  
Warren, MI 48090

Atlantic Credit & Finance, Inc.  
3353 Orange Avenue  
Roanoke, VA 24012

Atlantic Credit & Finance, Inc.  
c/o Lustig, Glaser & Wilson, P.C.  
P.O. Box 549287  
Waltham, MA 02454-9287

Credit One Bank  
P.O. Box 98875  
Las Vegas, NV 89193

Bank of America  
P.O. Box 15102  
Wilmington, DE 19885

Discover Bank  
c/o Law Office of Howard Lee Schiff  
340 Main Street, Suite 959  
Worcester, MA 01608

Citibank, SD  
701 E. 60th Street  
Sioux Falls, SD 57117

Discover Bank  
DB Servicing Corporation  
P.O. Box 3025  
New Albany, OH 43054

Elan Financial Services  
777 E. Wisconsin Avenue  
Milwaukee, WI 53202

FIA Card Services  
c/o Asset Acceptance LLC  
P.O. Box 2036  
Warren, MI 48090

Firstsource Advantage, LLC  
205 Bryant Woods South  
Amherst, NY 14228

Focus Receivables Management  
1130 Northchase Parkway, Suite 150  
Marietta, GA 30067

GECRB/Lowes  
P.O. Box 965005  
Orlando, FL 32896

Law Office of Thomas A. Gibbons, P.C.  
12 Park Street  
Ayer, MA 01432

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21 Worthen Road  
Lexington, MA 02421

American Express Bank, FSB  
c/o Becket and Lee LLP  
P.O. Box 3001  
Malvern, PA 19355-0701

MCYDSNB  
9111 Duke Boulevard  
Mason, OH 45040

Midland Credit Management, Inc.  
8875 Aero Drive  
Suite 200  
San Diego, CA 92123

Portfolio Recovery Associates, LLC  
c/o Lustig, Glaser & Wilson, P.C.  
P.O. Box 549287  
Waltham, MA 02454-9287

Portfolio Recovery Associates, LLC  
P.O. Box 12914  
Norfolk, VA 23541

CACH, LLC  
4340 S. Monaco Street, 2<sup>nd</sup> Floor  
Denver, CO 80237

Redline Recovery  
5959 Corporate Drive, Suite 1400  
Houston, TX 77036

THD/CBNA  
P.O. Box 790328  
St. Louis, MO 63179

Transworld Systems  
P.O. Box 17221  
Wilmington, DE 19850

Van Ru Credit Corporation  
11069 Strange Line Road  
Building E  
Lenexa, KS 66215

Verizon New England, Inc.  
c/o Midland Credit Management, Inc.  
8875 Aero Drive, Suite 200  
San Diego, CA 92123

Worker Credit Union  
815 Main Street  
Fitchburg, Massachusetts 01420

/s/ Robert F. Casey, Jr.  
Robert F. Casey, Jr.